

**UNITED STATES DISTRICT COURT**  
for the  
District of New Mexico

**FILED**  
United States District Court  
Albuquerque, New Mexico  
Mitchell R. Elfers  
Clerk of Court

United States of America  
v.  
Allen A. Gonzales (YOB 1975)

Case No. **22 MJ 1212**

\_\_\_\_\_  
*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 22, 2022 in the county of San Juan in the  
\_\_\_\_\_  
District of New Mexico, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 922(g)(1) and 924

*Offense Description*  
Felon in Possession of a Firearm and Ammunition

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

  
\_\_\_\_\_  
*Complainant's signature*

Jacob Courtney - ATF Task Force Officer  
\_\_\_\_\_  
*Printed name and title*

Telephonically sworn and electronically signed.

Date: July 22, 2022

  
\_\_\_\_\_  
*Judge's signature*

City and state: Albuquerque, New Mexico

Hon. Kirtan Khalsa, United States Magistrate Judge  
\_\_\_\_\_  
*Printed name and title*

Criminal Complaint - Continued.

United States of America

V.

Allen GONZALES

SSN: 0685

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**AFFIDAVIT**

I, Jacob C. Courtney, a Task Force Officer (TFO) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), being duly sworn, depose and state:

1. I make this affidavit in support of the arrest of ALLEN ANTHONY GONZALES (year of birth 1975, social security number XXX-XX-0685) (hereafter "GONZALES"), for a violation of 18 U.S.C. §§ 922(g)(1) and 924, Felon in Possession of a Firearm and Ammunition.
2. I have worked as a TFO since February 2020. I am currently assigned to the Albuquerque Field Office Task Force of the ATF and have primary investigative responsibility in violent crimes occurring within San Juan County, New Mexico dealing with violent offenders/crimes, crimes involving firearms and individuals with prior felony convictions. As a TFO, I am charged with enforcing criminal laws, including violations of 18 U.S.C. §§ 922(g) and 924, and I am authorized by law to request an arrest warrant.
3. I am currently assigned to the San Juan County Sheriff's Office Detective Division. I have received training in criminal investigation and prosecution in the San Juan County Criminal Justice Training Authority. I have conducted and participated in numerous investigations involving a range of misdemeanor and felony crimes which have resulted in seizures, arrests, and prosecutions of criminal offenders. I have received extensive training and experience in investigations. I have received additional training in homicide and death investigations, child death investigations, arson investigations, interviewing techniques, and others as my tenure as a detective. The facts in this affidavit come from my personal observations, my training and experience and information obtained from other agents and witnesses.
4. I am a member of the Fire and Explosion Task Force in San Juan County which is comprised of another San Juan County Detective and multiple Fire Investigators. I have specific training in residential arsons, vehicle arsons, and explosive reconstruction training.
5. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

**PROBABLE CAUSE**

6. On July 21, 2022, the Farmington Police Department began investigating a battery allegedly committed by GONZALES against victim T.W., whose full name is known to me but not included here to protect the ongoing investigation.

Criminal Complaint - Continued.

United States of America

V.

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7. As part of this investigation, C.G., whose full name is also known to me, advised that GONZALES had a large number of firearms in his (GONZALES') residence and was a convicted felon. C.G. also showed Farmington Police a video from July 21, 2022, which shows a large number of firearms (rifles and pistols) and ammunition inside GONZALES' residence. I also observed this video and observed a large number of rifles, pistols and ammunition. This information was corroborated by T.W.
8. Based on the above information, I obtained a federal search warrant for GONZALES' residence, 1103 N. Auburn in Farmington, New Mexico (San Juan County) on July 22, 2022. The search warrant was executed on the same day, July 22, 2022. During the search, law enforcement located and seized twenty-six (26) firearms, including thirteen (13) rifles and shotguns and thirteen (13) pistols and revolvers.
9. I researched one rifle and one pistol from the large number of seized firearms and found they were not manufactured in the State of New Mexico, therefore affecting interstate commerce. The first is a rifle, identified as a Ruger .300 Win Mag with serial number 1804-24216. The second, a pistol, is identified as a Taurus G2, 9mm pistol with serial number TIP98911. These two firearms also meet the federal definition of "firearm," pursuant to 18 U.S.C. § 921(a)(3). Interstate nexus analysis on the remaining firearms is pending.
10. During the search, a large amount of ammunition was also located in the same room as the above listed firearms. Thousands of rounds of different caliber ammunition were confiscated.
11. I queried GONZALES through the Interstate Identification Index (III) and confirmed that GONZALES is a convicted felon, having been convicted of multiple felony crimes within the state of California, to include: Voluntary Manslaughter (1994); Robbery (Firearm used) (1994), Fraudulent checks (1998); felony domestic violence (2005) and Possession of a controlled substance (2006). There is probable cause to believe that GONZALES knows that he has been convicted of a crime carrying a penalty of over one year in prison because he has served over one year of prison on at least one of the offenses listed above.
12. Based upon these facts, I believe that there is probable cause to believe that Allen GONZALES has committed the crime of felon in possession of a firearm and ammunition, in violation of 18 U.S.C. §§ 922(g)(1) and 924.
13. Assistant United States Attorney Sarah Mease has reviewed and approved this complaint.

Criminal Complaint - Continued.

United States of America

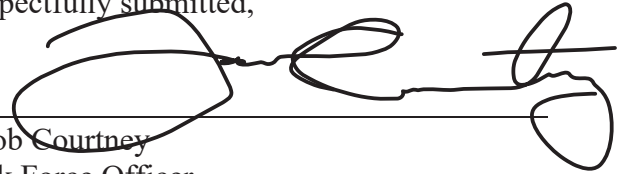
V.

Allen GONZALES

SSN: 0685

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jacob Courtney', written over a horizontal line.

Jacob Courtney  
Task Force Officer  
ATF

Subscribed and sworn to before me by reasonable electronic means,  
on July 22, 2022:

A handwritten signature in black ink, appearing to read 'Kirtan Khalsa', written over a horizontal line.

KIRTAN KHALSA  
UNITED STATES MAGISTRATE JUDGE